

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., et al.,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appear, pursuant to Section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors (collectively, the “Debtors”) for and on behalf of Corpus Christi Firefighters’ Retirement System (the “Plaintiff”) in the action pending in the Court of Common Pleas, Franklin County, Ohio, Civil Division, under the caption, *Corpus Christi Firefighters’ Retirement System vs. Macellum Capital Management, L.P. et al.*, Case No. AM-21CV002695 (the “Litigation”).

PLEASE TAKE FURTHER NOTICE that the undersigned counsel, on behalf of the Plaintiff, hereby request service of any and all notices given or required to be given in the Chapter 11 Cases, and all papers served or required to be served in the Chapter 11 Cases, including all adversary proceedings and other related cases and proceedings (collectively, “Related

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

Proceedings”), and requests that the names and addresses of the undersigned counsel be added to all mailing matrices and service lists maintained in the Chapter 11 Cases. Service may be made and directed as follows:

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PLEASE TAKE FURTHER NOTICE that this request for service includes not only the notices and papers referred to in the Bankruptcy Code, the Bankruptcy Rules, and the Federal Rules of Civil Procedure (wherever applicable), but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier, email, or electronic filing or otherwise filed or made with regard to the Chapter 11 Cases or any Related Proceedings, and for the purposes of CM/ECF.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by the Plaintiff, does not, shall not, and shall not be deemed to:

- constitute a submission by the Plaintiff to the jurisdiction of the Bankruptcy Court;
- constitute consent by the Plaintiff to entry by the Bankruptcy Court of any final order in any non-core proceeding, which consent is hereby withheld unless, and solely to the extent, expressly granted in the future with respect to a specific proceeding; or
- waive any substantive or procedural rights of the Plaintiff, including but not limited to (a) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on any matter; (b) the right to have final orders in non-core matters entered only after de novo review by a United States District Court judge; (c) the right to trial by jury in any proceedings so triable herein, in any Related Proceedings, in the Litigation, or in any other case, controversy, or proceeding related to or arising from the Debtors, the Chapter 11 Cases, any Related Proceedings, or the Litigation; (d) the right to seek withdrawal of the bankruptcy reference by a United States District Court in any matter subject to mandatory or discretionary withdrawal; or (e) all other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which the Plaintiff is or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under any applicable law, rule, regulation, or order.

Dated: November 6, 2024
Wilmington, Delaware

CROSS & SIMON, LLC

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